May 1, 2024

To: Ms. Catherine Morris, USAA US Attorney's Office Detroit, Michigan

RE: U.S. v. Jagrant Gill, Case No. 22-cr-20317, Forfeiture of PETERBILT TRUCK: Ms. Kirandeep Gill's interest

Dear Ms. Momis:

This email is being written to request the return of a Peterbilt truck owned by my client, Ms. Kirandeep Gill, pursuant to a letter I received from your office dated April 11, 2024, regarding the forfeiture of said vehicle. Ms. Gill is the wife of the defendant, and has a legitimate interest in the truck, per the attachment to this email, as follow:

- a. Notice of Seizure; with SIGNED EXECUTED CLAIM FORM
- b. Marriage certificate
- c. Vehicle Registration for 1999 Peterbilt Truck
- d. Certification of Incorporation of business jointly owned by married couple, Kirendeep Gill and husband Jagrant GILL (defendant)
- e. Ms. Gill's Ontario TYPE A, Commercial Driver's License
- f. Chart from Ontario Department of Transportation showing Class A License.
- Yuling a. Picture of truck 110 geobarn't fluster honoliting only to brong streets table
 - h. Criminal complaint against husband, Jagrant GILL
 - i. Indictment against husband, Jagrant GILL

Kirandeep Gill is a commercial truck driver. She drives the instant truck in her line of business.

She has never been involved in the illicit drug trade. She has never been even questioned, let alone indicted, and at this juncture, I hope I am correct in thinking that she never would be.

Importantly, there was never a government showing of willful negligence on her part surrounding her husband's case.

EQUITALE PROPOSAL

The equitable solution that undersigned proposes is that the truck be returned upon payment of storage fees, which will be substantial.

Recently, for another client, I was able to get a car released from US Customs and Border Protection. The storage fees alone for a small car were \$1.086.90 for about 176 days. That averages to about \$6.17 per day. I imagine the Peterbilt truck at issue

would cost substantially more considering it takes up at least twice the length of a car and had been in storage for about 785 days. Making a conservative estimate using calculations at the same price as the small car. Ms. Gill is staring at storage fees of \$4,843.45 (785 days x \$6.17 per day = \$4,843.45) — but realistically much more.

Ms. Gill has also been "punished" because she is a truck driver, and has lost revenue from driving that truck locally since its seizure on or about February 24, 2022. Over 25 months of lost revenue has been devastating not just to Ms. Gill, but also to people in her family system.

Previous to the seizure, the family business grossed approximately \$12,000 Canadian dollars per month hauling full-time with the Peterbilt truck. This represents a loss of \$300,000 in revenue in the past 25 months since the seizure. This seizure has ruined her financially and it has been a struggle for her to stay afloat. Ms. Gill has been in business for about 15 years and has never had contact with law enforcement before, and just wishes to provide for her extended family with the truck once again. Ms. Gill tells me that she is in a desperate financial situation. She can barely pay the minimum on her credit card, and has rented out rooms in her home to stay afloat. She is paying the price every day.

Therefore, the undersigned respectfully asks the US Attorney's Office to agree that an equitable solution would be to ask the court to order that Ms. Gill has a legitimate interest in the 1999 Peterbilt Truck, and order it returned upon payment of the storage fees.

This letter is signed by the petitioner herself, Kirandeep GILL, under penalty of perjury.

I, Kirandeep GILL, have read the contents of this letter carefully and fully. I, Kirandeep GILL, under penalty of perjury, do hereby certify that the foregoing information is true and correct.

This the 2 day of May ,2024.

Kirandeep GILL

Krenelastlill

Current Address:

Prepared by:

s/Liane Kufchock

Liane Kufchock, P70273

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